

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	Criminal No. 1:16-CR-00212
	:	
v.	:	(Chief Judge Conner)
	:	
KEVIN COLES	:	(Electronically Filed)

**MOTION TO CONTINUE PRETRIAL MOTIONS DEADLINE
AND TO CONTINUE JURY SELECTION AND TRIAL**

AND NOW, comes the defendant, Kevin Coles, by his attorney Thomas A. Thornton, Esquire, of the Federal Public Defender's Office, and files this Motion to Continue Pretrial Motions Deadline and to Continue Jury Selection and Trial, and in support thereof avers as follows:

1. On August 3, 2016, Kevin Coles was charged in a five-count indictment with conspiracy of possession with intent to distribute heroin and cocaine in violation of 21 U.S.C. §846 (Count 1); intentionally and knowingly possessing with the intent to distribute crack cocaine in violation of 21 U.S.C. §841(a)(1) and 18 U.S.C. §2 (Counts 2 and 4); and, possession of a firearm in furtherance of drug trafficking in violation of 21 U.S.C. §924(c)(1) and 18 U.S.C. §2 (Count 5).
2. On September 8, 2016, Kevin Coles appeared before the Honorable Martin C. Carlson and entered a plea of not guilty to the indictment.

3. Trial is scheduled for November 7, 2016, and pretrial motions are due on or before September 28, 2016.

4. As plea negotiations in this matter are ongoing, it is respectfully requested that the deadline for filing pretrial motions be continued for 30 days and that trial be scheduled thereafter.

5. Assistant United States Attorney William A. Behe, Esquire, concurs in this continuance request.

WHEREFORE, for the foregoing reasons, the defendant, Kevin Coles, respectfully requests that this Honorable Court grant his Motion to Continue Pretrial Motions Deadline and to Continue Jury Selection and Trial.

Respectfully submitted,

Date: September 28, 2016

/s/ Thomas A. Thornton
THOMAS A. THORNTON, ESQUIRE
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CERTIFICATE OF SERVICE

I, Thomas A. Thornton of the Federal Public Defender's Office, do hereby certify that I served a copy of the foregoing **Motion to Continue Pretrial Motions Deadline and to Continue Jury Selection and Trial**, via Electronic Case Filing, or by placing a copy in the United States mail, first class in Harrisburg, Pennsylvania, addressed to the following:

WILLIAM A. BEHE, ESQUIRE
Assistant United States Attorney
United States Attorney's Office
228 Walnut Street, Room 220
Harrisburg, PA 17108

KEVIN COLES
Franklin County Prison
1804 Opportunity Avenue
Chambersburg, PA 17201

Date: September 28, 2016

/s/ Thomas A. Thornton
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